

Kentucky Power Company

REQUEST

Refer to the Wagner Testimony, pages 54 and 55, and Exhibit EKW-5, pages 98 through 102 of 103.

- a. Provide the calculation of the Base Period Revenue Requirement ("BRR") that reflects the rate base for Kentucky Power and Rockport as of June 30, 2005 and the operating expenses as of June 30, 2005. Use Form 2.00 through Form 2.21 from the monthly environmental surcharge reporting formats to show the calculation, and include any additional calculations, workpapers, or assumptions needed to determine the BRR.
- b. Explain why Kentucky Power is proposing to include the "Monthly Environmental Base Costs" ("MEBC") component as a subtraction from the Current Period Revenue Requirement ("CRR") instead of adding the MEBC to the BRR.
- c. Explain why Kentucky Power believes it is reasonable for the MEBC component to fluctuate each billing month rather than using a monthly average amount based on the 12-month total.

RESPONSE

- a. In reviewing Exhibit EKW-12, lines 2 and 3 should have been removed from the schedule. Line 1 CRR from ES Form 3.00 should have the Base Month Tariff 29-5 Environmental Surcharge subtracted and that result is the increase/(decrease) of monthly environmental surcharge amount (Line 3). Now that the base monthly amounts listed on Tariff 29-5, paragraph 6, are rolled into base rates, ES FORM 2.00 through ES FORM 2.21 are not needed.

The requested calculations are attached.

The Base Period Revenue Requirement (BRR) in the Environmental Surcharge Tariff should reflect the environmental revenues included in base rates. The level of Environmental Surcharge revenues included in the twelve months ending will be the level of environmental costs incurred in during the June 30, 2005 test year

since revenues are based on the Company's costs. The level of environmental costs incurred in the test year was \$28,106,683 (Please see Exhibit EKW-11). Using the June 30, 2005 monthly level of environmental costs for Big Sandy and the Rockport Plants fails to recognize the gains on allowances which are reflected in the Company's test year as a negative costs. Using the June 2005 Big Sandy and Rockport costs and annualizing the June 30, 2005 amount of \$2,756,266 will over state the environmental costs reflected in the test year by \$4,968,509 $((\$2,756,266 \times 12) - \$28,106,683)$ (Please see page 4 of this response). When the BRR was only the fixed costs, such as in the last rates cases, the BRR could be a fixed level amount each month however, because there are variable cost included in the environmental surcharge base the monthly environmental costs should vary just like the system sales base.

- b. Kentucky Power (Company) is proposing to subtract the MEBC component from Current Period Revenue Requirement (CRR) because the environmental costs and gains or losses on the sale of emission allowances are part of the base rate case. Since the environmental costs and gains or losses are part of the Kentucky P.S.C. Jurisdictional total operating revenues and operating expenses on Section V, Schedule 5, Column 6, the Company would subtract the MEBC component from the CRR and the result would be an increase or decrease of monthly environmental costs. The monthly environmental surcharge would either be a charge or credit surcharge factor on the customer's bill. The original amount listed as the BRR amount was the revenue requirement of the original investment at the time of the Company's last rate case. Now with the new rate case the BRR amounts would be the monthly environmental revenue requirement as listed on tariff 29-5 since that is the new costs included in the test year. This should work much like setting a new base in the system sales clause.
- c. The reason the MEBC would fluctuate each billing month is that the monthly environmental costs vary from month to month. For example, during the ozone season there are costs that do not occur during other times of the year, such SCR operator over-time, the cost of urea and the cost of trona.

WITNESS - Errol K. Wagner

Exhibit EKW - 12 (Revised)
 Page 1 of 1

ES FORM 1.00

AMERICAN ELECTRIC POWER - ENVIRONMENTAL SURCHARGE REPORT
 CALCULATION OF E(m) and SURCHARGE FACTOR
 For the Expense Month of July 2005

<u>CALCULATION OF E(m)</u>		
E(m) = CRR - BRR		
LINE 1	CRR from ES FORM 3.00	\$2,844,388
* LINE 2	Base Month Tariff 29-5 Environmental Surcharge	\$2,818,212
* LINE 3	Increase/(Decrease) of Monthly Environmental Surcharge	\$26,176
LINE 4	Kentucky Retail Jurisdictional Allocation Factor, from ES FORM 3.30, Schedule of Revenues, LINE 1	64.6%
LINE 5	KY Retail E(m) (LINE 3 * LINE 4)	\$16,910
LINE 6	Over/(Under) Recovery Adjustment from ES FORM 3.30	(\$43,922)
LINE 7	Net KY Retail E(m) (LINE 5 + LINE 6)	(\$27,012)
<u>SURCHARGE FACTOR</u>		
LINE 8	Net KY Retail E(m) (Line 7)	(\$27,012)
LINE 9	KY Retail R(m) from ES FORM 3.30	\$28,766,132
LINE 10	Environmental Surcharge Factor for Expense Month (Line 8 / LINE 9)	-0.0939%

* New Lines Added

Effective Date for Billing: September 2005

Submitted By : _____

Title : Director Regulatory Services

Date Submitted : August 19, 2005

ES FORM 2.00

AMERICAN ELECTRIC POWER - ENVIRONMENTAL SURCHARGE REPORT
 BASE PERIOD REVENUE REQUIREMENT
 For the Expense Month of June 2005

CALCULATION OF BASE PERIOD REVENUE REQUIREMENT

LINE NO.	COMPONENTS	
1	First Component - Associated with Big Sandy $((RB\ KP(B))\ (ROR\ KP(B))/12)$ ES FORM 2.10, Line 11	\$2,752,437
2	Second Component - Associated with Rockport $[((RB\ IM(B))\ (ROR\ IM(B))/12) + OE\ IM\ (B)]\ (.15)$ ES FORM 2.11, Line 12	<u>\$3,829</u>
3	Total Base Period Revenue Requirement, BRR Record on ES FORM 1.00, Line 2	\$2,756,266

Annualized Amount ==> \$33,075,192

Proposed Tariff 19-1

January	2,531,784
February	3,003,995
March	2,845,066
April	2,095,535
May	1,514,859
June	1,913,578
July	2,818,212
August	2,342,883
September	2,852,305
October	2,181,975
November	2,598,522
December	1,407,969
Total Proposed Tariff 19-1	28,106,683

Difference ==> 4,968,509

AMERICAN ELECTRIC POWER - ENVIRONMENTAL SURCHARGE REPORT
 BASE PERIOD REVENUE REQUIREMENT
 COSTS ASSOCIATED WITH BIG SANDY

For the Expense Month June 2005

LINE NO.	COST COMPONENT		
	Return on Rate Base :		
1	Utility Plant at Original Cost	\$189,168,203	
2	Less Accumulated Depreciation	(\$20,015,975)	
3	Less Accum. Def. Income Taxes	(\$26,845,295)	
4	Net Utility Plant		\$142,306,933
5	SO2 Emission Allowance Inventory from ES FORM 3.11		\$14,099,397
6	ECR & NOx Emission Allowance Inventory from ES FORM 3.12		\$0
7	Cash Working Capital Allowance from ES FORM 3.13, Line11		\$100,152
8	Total Rate Base		\$156,506,482
9	Weighted Average Cost of Capital - ES FORM 3.15	10.20%	
10	Monthly Weighted Avg. Cost of Capital (7)/12		0.85%
11	Monthly Return of Rate Base (6) * (8)		\$1,330,305
	Operating Expenses :		
12	Monthly Depreciation Expense		\$570,137
13	Monthly Catalyst Amortization Expense		\$46,029
14	Monthly Property Taxes		\$4,749
15	Monthly Kentucky Air Emissions Fee		\$24,732
16	Monthly Gavin Scrubber Cost from ES FORM 3.14		\$256,410
17	Monthly 2003 Plan Non-Fuel O&M Expenses from ES FORM 3.13		\$315,826
18	Monthly SO2 Emission Allowance Consumption		\$204,249
19	Monthly ERC & NOx Emission Allowance Consumption		\$0
20	Total Operating Expenses [Line 12 thru Line 18]		\$1,422,132
21	Total Revenue Requirement - Big Sandy Record on ES FORM 3.00, Line 1		\$2,752,437

AMERICAN ELECTRIC POWER - ENVIRONMENTAL SURCHARGE REPORT
 BASE PERIOD REVENUE REQUIREMENT
 COSTS ASSOCIATED WITH ROCKPORT

For the Expense Month June 2005

LINE NO.	COST COMPONENT		
	Return on Rate Base :		
1	Utility Plant at Original Cost	\$1,380,823	
2	Less Accumulated Depreciation	(\$488,015)	
3	Less Accum. Def. Income Taxes	(\$109,772)	
4	Total Rate Base		\$783,036
5	Weighted Average Cost of Capital - ES FORM 3.21	13.7534%	
6	Monthly Weighted Avg. Cost of Capital (LINE 5/12)		1.1461%
7	Monthly Return of Rate Base (4 * 6)		\$8,975
	Operating Expenses :		
8	Monthly Depreciation Expense		\$4,051
9	Monthly Indiana Air Emissions Fee		<u>\$12,500</u>
10	Total Operating Expenses (8 + 9)		<u>\$16,551</u>
11	Total Revenue Requirement, Cost Associated with Rockport (7) + (10)		\$25,526
12	Kentucky Power Portion of Rockport Total Revenue Requirement. Record on ES FORM 3.00, Line 2 (11 * 15%)		\$3,829

ES FORM 2.20

AMERICAN ELECTRIC POWER - ENVIRONMENTAL SURCHARGE REPORT
 CURRENT PERIOD REVENUE REQUIREMENT
 BIG SANDY PLANT COST OF CAPITAL

For the Expense Month of June 2005

LINE NO.	Component	Balances	Cap. Structure	Cost Rates		WACC (Net of Tax)	GRCF		WACC (PRE-TAX)	
		As of 12/31/2002								
1	L/T DEBT	\$466,631,680	57.24%	5.752%		3.29%			3.29%	
2	S/T DEBT	\$23,386,094	2.87%	2.062%		0.06%			0.06%	
3	ACCTS REC									
3	FINANCING	\$27,214,021	3.34%	2.804%		0.09%			0.09%	
4	C EQUITY	\$298,018,017	36.56%	11.000%	1/	4.02%	1.6801	2/	6.76%	
5	TOTAL	\$815,249,812	100.00%			7.46%			10.20%	
1/	WACC = Weighted Average Cost of Capital Rate of Return on Common Equity per Case No. 2002 - 00169									
2/	Gross Revenue Conversion Factor (GRCF) Calculation:									
1	OPERATING REVENUE						100.00			
2	UNCOLLECTIBLE						<u>0.20</u>			
3	INCOME BEFORE STATE TAXES						99.80			
4	LESS : STATE INCOME TAX									
5	(LINE 3 X .0825)						<u>8.23</u>			
6	INCOME BEFORE FED INC TAX						91.57			
7	LESS : FEDERAL INC TAX									
8	(LINE 6 X .35)						<u>32.05</u>			
9	OPERATING INC PERCENTAGE						<u>59.52</u>			
10	GROSS REVENUE CONVERSION									
11	FACTOR (100%/LINE 9)						1.6801			

AMERICAN ELECTRIC POWER - ENVIRONMENTAL SURCHARGE REPORT
 CURRENT PERIOD REVENUE REQUIREMENT
 ROCKPORT UNIT POWER AGREEMENT COST OF CAPITAL

For the Expense Month June 2005

LINE NO.	Component	Balances	Cap. Structures	Cost Rates		WACC (NET OF TAX)	GRCF		WACC (PRE - TAX)
		As of 06/30/2005							
1	L/T DEBT	44,823,280	50.8987%	4.6606%		2.3722%			2.3722%
2	S/T DEBT	0	0.0000%	3.1893%		0.0000%			0.0000%
	CAPITALIZATION OFFSETS (Temporary Investments)	(7,487,428)	-8.5023%	4.6605%		-0.3962%			-0.3962%
3	DEBT								
4									
5	C EQUITY	50,727,863	57.6036%	12.1600%	1/	7.0046%	1.681379	2/	11.7774%
6	TOTAL	88,063,715 =====	100.0000% =====			8.9806% =====			13.7534% =====
WACC = Weighted Average Cost of Capital 1/ Cost Rates per the Provisions of the Rockport Unit Power Agreement 2/ Gross Revenue Conversion Factor (GRCF) Calculation:									
1	OPERATING REVENUE						100.00		
2	LESS: INDIANA ADJUSTED GROSS INCOME								
3	(LINE 1 X .085)						8.500		
4	INCOME BEFORE FED INC TAX						91.500		
5	LESS: FEDERAL INCOME TAX								
6	(LINE 4 X .35)						32.025		
7	OPERATING INCOME PERCENTAGE						59.475		
8	GROSS REVENUE CONVERSION								
9	FACTOR (100% / LINE 7)						1.681379		

Kentucky Power Company
 Gain/(Losses) on Sales of Emission Allowances
 July 2004 to June 2005

	SO2 Allowances	NOx Allowances	Total Gains/(Loss) SO2 & NOx Allowances
July 2004	0	0	0
August 2004	0	557,500	557,500
September 2004	0	0	0
October 2004	0	441,000	441,000
November 2004	0	0	0
December 2004	1,379,523	0	1,379,523
January 2005	0	0	0
February 2005	(8,947)	0	(8,947)
March 2005	0	0	0
April 2005	505,556	154,500	660,056
May 2005	575,254	982,500	1,557,754
June 2005	247,717	841,500	1,089,217
Total	2,699,103	2,977,000	5,676,103
	Monthly Average		473,009

Kentucky Power Company

REQUEST

Refer to the Application, the Depreciation Study – Study Workpapers. Provide an explanation of how Mr. Henderson determined the gross removal and gross salvage rates for all plant accounts. Include in the explanation a discussion of how the provided study workpapers support the values for gross removal and gross salvage.

RESPONSE

Please refer to pages 7, 8 and 9 of Exhibit JEH-1 for a discussion of how the gross removal and salvage rates were determined. Pages 3, 19 and 20 of the study workpapers contain support for the calculation of salvage and removal for Production Plant. Pages 111 through 116 of the study workpapers support the calculation of salvage and removal for Transmission Plant.

Pages 237 through 242 of the study workpapers support the calculation of salvage and removal for Distribution Plant and Pages 381 through 443 of the study workpapers support the salvage and removal calculations for General Plant. Since Kentucky Power maintains the accumulated depreciation at a functional plant level, the gross removal and gross salvage costs are recorded at the functional plant level instead of by individual plant account. Mr. Henderson chose the 15 year period of actual company salvage and removal history to be representative of Kentucky Power's ongoing salvage and removal costs. Then, since it was desired to recommend salvage and removal rates for individual accounts, Mr. Henderson allocated the salvage and removal costs to individual plant accounts. Based on the original cost retirements by account, salvage and removal rates were developed that approximated the 15 year actual functional history. The study workpapers include a summary page for each plant account that explains the reasoning for the salvage and removal percentages.

WITNESS – James E. Henderson

Kentucky Power Company

REQUEST

Refer to the Application, the Depreciation Study – Study Workpapers, page 2 of 443. Given the difference in the expected retirement dates for the Big Sandy generating units, was the estimated demolition cost of \$32,000,000 allocated to the two units and spread over the appropriate remaining lives of the units? Explain the response.

RESPONSE

Yes, the estimated demolition was spread over the remaining lives of the units. Please refer to page 3 of 443 in the study workpapers. The demolition costs were allocated to the individual plant accounts.

Please refer to pages 9 through 13 of 443 of the study workpapers that calculate the remaining life of Big Sandy Plant giving consideration to the retirement of Big Sandy Unit 1 in year 2015.

These workpapers develop a weighted average remaining life for Big Sandy plant based on the retirement dates for each unit.

The demolition costs is recovered over the weighted average remaining life of Big Sandy Plant.

WITNESS – James E. Henderson

Kentucky Power Company

REQUEST

Refer to the Application, the Depreciation Study – Study Workpapers. For each of the plant accounts listed below, provide the reason(s) for the change in the net salvage percentage between the current and recommended levels.

- a. Account 354 – Towers and Fixtures, page 89 of 443.
- b. Account 355 – Poles and Fixtures, page 94 of 443.
- c. Account 356 – Overhead Conductor and Devices, page 99 of 443.
- d. Account 362 – Station Equipment, page 176 of 443.
- e. Account 364 – Poles, Towers and Fixtures, page 191 of 443.
- f. Account 367 – Underground Conductor and Devices, page 206 of 443.
- g. Account 369 – Services, page 216 of 443.
- h. Account 370 – Meters, page 221 of 443.
- i. Account 371 – Installations on Customers Premises, page 226 of 443.
- j. Account 373 – Street Lighting and Signal Systems, page 231 of 443.

RESPONSE

Please refer to the response to Staff Question No. 83. The reasons for the changes in each of the above accounts are a direct result of changes in the actual salvage and removal cost history of Kentucky Power Company for the 15 year period 1990 through 2004.

WITNESS – James E. Henderson

Kentucky Power Company

REQUEST

Refer to the response to the Staff's First Request, Item 9, page 16 of 114. Provide an updated version of this schedule including the most recent monthly information. In addition, calculate the 13-month average at the end of each 13-month period beginning with July 2003.

RESPONSE

Please refer to Attachment 1.

WITNESS - Errol K. Wagner

Kentucky Power Company

(A)	(B)	(C)	(D)	(E)	(F)
Month/Yr	12 Mo Ended Disposed		Ending Inventory	D/C	13 Mo Avg
	Elec Gen + Storage	Pile Adj			
Oct-05	2,818,998	7,723	189,777	24.6	26.5
Sep-05	2,688,366	7,365	226,967	30.8	26.1
Aug-05	2,637,512	7,226	184,443	25.5	25.5
Jul-05	2,618,010	7,173	156,508	21.8	25.5
Jun-05	2,593,590	7,106	207,146	29.2	26.7
May-05	2,569,402	7,039	204,094	29.0	27.6
Apr-05	2,620,859	7,180	148,007	20.6	28.8
Mar-05	2,618,159	7,173	169,903	23.7	30.7
Feb-05	2,499,603	6,848	193,442	28.2	31.5
Jan-05	2,528,443	6,927	200,207	28.9	32.6
Dec-04	2,607,559	7,144	140,131	19.6	34.1
Nov-04	2,644,805	7,246	241,106	33.3	37.2
Oct-04	2,709,845	7,424	212,772	28.7	39.8
Sep-04	2,712,995	7,433	150,813	20.3	42.2
Aug-04	2,689,570	7,369	170,001	23.1	45.0
Jul-04	2,733,258	7,488	192,491	25.7	47.6
Jun-04	2,755,103	7,548	282,973	37.5	51.3
May-04	2,717,089	7,444	297,843	40.0	53.9
Apr-04	2,685,886	7,359	326,204	44.3	56.0
Mar-04	2,597,183	7,116	330,140	46.4	58.0
Feb-04	2,590,205	7,096	240,679	33.9	59.3
Jan-04	2,503,898	6,860	291,736	42.5	60.7
Dec-03	2,470,275	6,768	327,843	48.4	61.8
Nov-03	2,248,040	6,159	367,598	59.7	61.6
Oct-03	2,066,123	5,661	375,223	66.3	60.4
Sep-03	1,961,339	5,374	325,544	60.6	58.6
Aug-03	1,940,179	5,316	299,332	56.3	58.1
Jul-03	1,990,177	5,453	313,661	57.5	59.0
Jun-03	2,005,113	5,493	403,845	73.5	
May-03	2,079,390	5,697	407,557	71.5	
Apr-03	2,089,958	5,726	382,261	66.8	
Mar-03	2,126,217	5,825	410,573	70.5	
Feb-03	2,201,572	6,032	385,162	63.9	
Jan-03	2,257,543	6,185	321,104	51.9	
Dec-02	2,291,040	6,277	356,519	56.8	
Nov-02	2,527,894	6,926	314,094	45.4	
Oct-02	2,647,898	7,255	323,177	44.5	
Sep-02	2,832,882	7,761	333,283	42.9	
Aug-02	2,924,170	8,011	427,691	53.4	
Jul-02	2,894,878	7,931	538,388	67.9	
Jun-02	2,882,636	7,898	638,109	80.8	
May-02	2,874,960	7,877	675,740	85.8	
Apr-02	2,894,090	7,929	657,527	82.9	
Mar-02	2,944,664	8,068	544,839	67.5	
Feb-02	2,979,424	8,163	498,280	61.0	
Jan-02	2,977,131	8,157	446,238	54.7	
Dec-01	2,981,506	8,169	443,714	54.3	
Nov-01	2,985,849	8,180	479,665	58.6	
Oct-01	3,053,604	8,366	438,746	52.4	
Sep-01	2,998,081	8,214	284,985	34.7	
Aug-01	3,019,568	8,273	212,124	25.6	
Jul-01	3,026,180	8,291	193,882	23.4	
Jun-01	3,019,298	8,272	185,654	22.4	

Kentucky Power Company

REQUEST

Refer to the response to the Staff's First Request, Item 12, page 2 of 19. Indicate when Kentucky Power performed its last jurisdictional cost allocation study prior to the one used in this case.

RESPONSE

Kentucky Power Company last performed its jurisdictional cost allocation study, prior to the one performed in connection with this case, in 1991 in conjunction with the filing of Case No. 91-066.

WITNESS - Errol K. Wagner

Kentucky Power Company

REQUEST

Refer to the response to the Staff's First Request, Item 19, pages 3 through 5 of 5. For each of the accounts listed below, provide the reason(s) for the change in the account balances between the test year and prior year.

- a. Account No. 311, Structures and Improvements, page 3 of 5.
- b. Account No. 312, Boiler Plant Equipment, page 3 of 5.
- c. Account No. 355, Poles and Fixtures, page 3 of 5.
- d. Account No. 365, Overhead Conductors and Devices, page 4 of 5.
- e. Account No. 367, Underground Conductors and Devices, page 4 of 5.
- f. Account No. 371, Installations on Customer Premises, page 4 of 5.
- g. Account No. 389, Land and Land Rights, page 5 of 5.
- h. Account No. 394, Tools, Shop and Garage Equipment, page 5 of 5.

RESPONSE

The reason for the change in the account balances noted above in items a. through g. from July 2004 to June 2005 is construction additions, retirements and transfers detailed on the attached schedule.

WITNESS – Ranie K. Wohnhas

<u>Company</u>	<u>Plant Account</u>	<u>Bal at 6/2005</u>	<u>Bal at 7/2004</u>	<u>Change in Acct Bal</u>	<u>Change Due to</u>			<u>Sum of Activity</u>
					<u>Addition</u>	<u>Retirement</u>	<u>Transfer</u>	
Kentucky Power	31100 - Structures, Improvemnt-Coal	\$37,865,247.88	\$35,757,526.40	\$2,107,721.48	\$2,148,384.20	-\$40,662.72		\$2,107,721.48
Kentucky Power	31200 - Boiler Plant Equip-Coal	\$326,971,046.88	\$323,686,165.21	\$3,284,881.67	\$4,763,797.99	-\$1,478,916.32		\$3,284,881.67
Kentucky Power	35500 - Poles and Fixtures	\$39,064,825.15	\$36,575,936.14	\$2,488,889.01	\$2,528,581.28	-\$39,692.27		\$2,488,889.01
Kentucky Power	36500 - Overhead Conductors, Device	\$102,420,173.25	\$97,350,866.07	\$5,069,307.18	\$5,960,508.98	-\$883,221.54	-\$7,980.26	\$5,069,307.18
Kentucky Power	36700 - Undergrnd Conductors,Device	\$5,923,246.94	\$4,831,433.44	\$1,091,813.50	\$1,123,563.60	-\$31,750.10		\$1,091,813.50
Kentucky Power	37100 - Installs Customer Premises	\$16,201,413.69	\$14,861,946.99	\$1,339,466.70	\$1,501,599.87	-\$172,854.79	\$10,721.62	\$1,339,466.70
Kentucky Power	38900 - Land	\$1,630,277.95	\$2,816,284.83	-\$1,186,006.88	\$22,571.12	-\$1,208,578.00		-\$1,186,006.88
Kentucky Power	39400 - Tools	\$2,115,769.71	\$1,695,197.95	\$420,571.76	\$424,048.76	-\$3,477.00		\$420,571.76
				\$14,616,644.42				\$14,616,644.42

Kentucky Power Company

REQUEST

Refer to the response to the Staff's First Request, Item 23(b), page 16 of 18. Explain why the total operating expenses for calendar year 2001 were so significantly higher than any other year shown in the response.

RESPONSE

Total operating expenses for the calendar year 2001 were significantly higher than other years primarily due to the accounting and reporting for purchased power related to trading activities.

Effective January 1, 2003, EITF 02-3 requires that gains and losses on all derivatives, whether settled financially or physically, be reported in the income statement on a net basis if the derivatives are held for trading purposes. Previous guidance in EITF 98-10 permitted non-financial settled energy trading contracts to be reported either gross or net in the income statement. Prior to 2002, Kentucky Power used the gross method and recorded and reported upon settlement, sales under forward trading contracts as revenues and purchases under forward trading contracts as purchased energy expenses. Starting in 2002, Kentucky Power began recording such forward trading revenues and purchases on a net basis as permitted by EITF 98-10.

WITNESS – Errol K. Wagner and Ranie K. Wohnhas

Kentucky Power Company

REQUEST

Refer to the response to the Staff's First Request, Item 23(c), page 17 of 18, lines 1 through 9.

- a. Explain in detail why the Kentucky jurisdictional amounts for the test year are higher than the total company amounts.
- b. Explain why there are no Kentucky jurisdictional administrative and general salaries and wages.

RESPONSE

- a. & b. Section V, Workpaper S-7, page 1 of 5, column 6 demonstrates that A&G Other (excluding regulatory) is allocated among Steam Production-Operation, Steam Production-Maintenance, Transmission Expenses, Distribution Expenses, Customer Account Expenses, and Customer Services Expense on the basis of O&M payroll. This is performed so that Administrative and General expenses are allocated among demand, energy and customer related functions. This is in accordance with the National Association of Regulatory Commissioners Electric Utility Cost Allocation Manual page 39. By allocating the A&G Other to the other functions and allocating those totals on the basis of demand and energy does force the Kentucky jurisdiction amounts higher than the total Company amounts for each of the functions. However, when there is a comparison made between the test year total Company amount on line 12 column h, with the Kentucky jurisdictional test year total amount on line 12 column j it can be readily determined that the Kentucky jurisdictional amount is less than the total Company amount.

WITNESS – Errol K. Wagner

Kentucky Power Company

REQUEST

Refer to the response to the Staff's First Request, Items 24(a) and 24(b), pages 2 and 3 of 4.

- a. For each of the job classifications or categories listed below, explain the reason(s) for the level of overtime hours reported for the test year.
 - (1) Coal Equipment Operator – Senior, page 2 of 4.
 - (2) Control Technician – Senior, page 2 of 4.
 - (3) Driver – Ground Worker, page 2 of 4.
 - (4) Line Crew Supervisor – NE, page 2 of 4.
 - (5) Line Mechanic – A, page 2 of 4.
 - (6) Line Servicer, page 2 of 4.
 - (7) Production Services Leader, page 3 of 4.
 - (8) Unit Operator, page 3 of 4.

- b. Has any review or analysis been performed of Kentucky Power's overtime hours recorded for the test year? If so, provide the results of the review or analysis.

RESPONSE

- a.
 - (1) Coal Equipment Operator - Senior: Approximately 10% of overtime due to 12 hr shift schedule; remainder of overtime due to vacation relief

 - (2) Control Technician - Senior: Approximately 10% of overtime for 4 techs due to 12 hr shift schedule; remainder of overtime for all 10 Sr techs due to technical support for unit outages, planned outage, and unit startups/shutdowns

 - (3) Driver - Ground Worker: Over 90% of overtime due to assisting line mechanics while restoring service to customers. The remaining 10% of overtime is continuation after regular work shift ends to complete a customer service job. A driver ground worker is a line mechanic who is not permitted to climb poles nor operate an aerial lift device. This person prepares the material on the ground, digs

pole holes and drives CDL required vehicles. KPCo currently only has one Driver Ground Worker as an employee

(4) Line Crew Supervisor-NE: Over 90% overtime due to restoring service to customers with the remaining 10% due to continuation after regular work shift ends to complete a customer service job.

(5) Line Mechanic-A: Over 90% overtime due to restoring service to customers with the remaining 10% due to continuation after regular work shift ends to complete a customer service job.

(6) Line Servicer: Over 90% overtime due to restoring service to customers with the remaining 10% due to continuation after regular work shift ends to complete a customer service job.

(7) Production Services Leader: Approximately 10% of overtime for 4 PSL's due to 12 hr shift schedule; remainder of overtime in support of unit startups/shutdowns, vacation relief, sick worker relief and planned outage maintenance supervision

(8) Unit Operator: Approximately 10% of overtime due to 12 hr shift schedule; remainder of overtime for vacation relief, sick worker relief, and support of unit startups/shutdowns

- b. Overtime expense is reviewed monthly by managers. There has not been any analysis performed concerning the plant or distribution line organization of overtime hours for the test year.

WITNESS -- Ranie K. Wohnhas

Kentucky Power Company

REQUEST

Refer to the response to the Staff's First Request, Items 26(a)(6)(1) through 26(a)(6)(4), page 2 of 8. In these responses Kentucky Power states that, per Commission precedent, deferred state income taxes are not recorded for certain items in the cost of service. Explain the response and provide citations to the "Commission precedent" noted.

RESPONSE

"Commission precedent" refers to the Kentucky PSC Case No. 91-066, in which no deferred state income taxes were recorded for any item in cost of service.

WITNESS – Errol K. Wagner

Kentucky Power Company

REQUEST

Refer to the response to the Staff's First Request, Item 30(a).

- a. Explain why advertising expenses were recorded in Account Nos. 500 and 506.
- b. Provide a schedule of the advertising expenses recorded in Account Nos. 921 and 930. The schedule should include a voucher or journal reference, the accounting date, a vendor name, the amount of the transaction, a brief description of the transaction, and an identification of the transaction as either "institutional," "education," or "safety." The description of the transaction must be something more descriptive than simply "advertising."

RESPONSE

- a. These advertising expenses were recorded to these accounts in error. They should have been classified to Account 921 or 930. All of these expenses were institutional and were removed for ratemaking purposes in this case.
- b. Please see response to AG 1st Set Item No. 44-a.

WITNESS -- Ranie K. Wohnhas

Kentucky Power Company

REQUEST

Refer to the response to the Staff's First Request, Item 30(b), page 5 of 23.

- a. Concerning the Edison Electric Institute ("EEI"), provide the current percentage of its total expenses for the following categories: legislative advocacy; legislative policy research; regulatory advocacy; regulatory policy research; advertising; marketing; utility operations and engineering; finance, legal, planning and customer service; and public relations.
- b. Provide the EEI definitions or descriptions of the expense categories listed in part (a) above.
- c. For each of the following organizations, describe the purpose or function of the organization. In addition, explain why the dues for these organizations should be included for rate-making purposes.
 - (1) Southeastern Electric Exchange.
 - (2) Southern Growth Policies Board.
 - (3) Southern States Energy Board.

RESPONSE

- a. Please refer to page 3 of this response.
- b. Please refer to pages 4 through 8 of this response.
- c. (1) Southeastern Electric Exchange (SEE) - The singlemost important function of the SEE is the development and implementation of a mutual assistance program among electric utilities. It was used extensively last year and this in response to the hurricane season. SEE has greatly enhanced the recovery time in providing electric service following a

natural disaster. Each utility that responds participates in at least daily if not more often, teleconference calls on the need for tree trimming, planners, line mechanics and fleet mechanics.

- (2) Southern Growth Policies Board (SGPB) - The SGPB is an organization focusing on continued growth throughout the south. It consists of several councils that review current public policy development in education, economic development, global growth and population trends. Using that information, the SGPB updates a "Future of the South" report annually which it presents in conjunction with the Southern Governors Association meeting. Members on the councils are appointed by their respective governor.

- (3) Southern States Energy Board (SSEB) - The SSEB mission is to enhance economic development and the quality of life in the South (16 states and two territories) through innovations in energy and environmental policies, programs and technologies. It develops, promotes and recommends policies and programs that ensure energy reliability and security and protection to enhance the environment.

WITNESS – Ranie K. Wohnhas

**Edison Electric Institute
 Schedule of Expenses by NARUC Category
 For Core Dues Activities
 For the Year Ended December 31, 2004**

KPSC Case No. 2005-00341
 Commission Staff 2nd Set Data Requests
 Order dated November 10, 2004
 Item No. 94
 Page 3 of 8

<u>NARUC Operating Expense Category</u>	<u>% of Dues</u>
Legislative Advocacy	23.40%
Legislative Policy Research	5.79%
Regulatory Advocacy	15.84%
Regulatory Policy Research	13.40%
Advertising	1.88%
Marketing	4.77%
Utility Operations and Engineering	8.13%
Finance, Legal, Planning and Customer Service	18.96%
Public Relations	7.83%
Total Expenses	<u>100.00%</u>

Comments:

- * The above percentages represent expenses associated with EEI's core dues activities, based on the operating expense categories established by NARUC. Core expenses are those expenses paid for by shareholder-owned electric utilities' dues.
- * The legislative advocacy percent will differ slightly for IRS reporting requirements. For 2004, the lobbying % for IRS reporting is 20.5%.
- * Administrative expenses are included in the percentages listed above. Approximately 11% of EEI's core dues expenses are administrative.

Edison Electric Institute
Audit Definitions of Accounts Used
For NARUC Reporting Requirement

LEGISLATIVE ADVOCACY (LA) - EEI defines the term "legislative advocacy" consistent with the definition of the term "lobbying" in IRC Section 162 (e). Title 26 USC 162 (e) (see Page I-4)

LEGISLATIVE POLICY RESEARCH (LP) - The cost of all efforts spent on research or the preparation of general or specific background information, studies, or analysis of proposed or potential legislation to determine its scope and potential impact, for use by EEI or its member companies. This account shall also include the cost of researching and responding to ALL inquiries regarding the potential impact, proper implementation, or effect of proposed or potential legislation but shall not include costs for legislative advocacy.

Legislative Policy Research begins when resources are expended for the purposed described in the above areas.

REGULATORY ADVOCACY (RA) - The cost of all written and oral communications with Federal or State regulatory agencies intended to influence the actions of such agencies and the cost of other expenditures which contribute in a general manner to furthering an EEI or member company position on a regulatory or administrative matter.

REGULATORY POLICY RESEARCH (RP) - Includes all costs divided into the following categories:

- (1) **Federal** - The cost of studying and responding to notices of inquiry or proposed Federal rulemaking or administrative or regulatory proceedings, including the filing of comments on proposed regulatory or administrative actions; discussions with federal regulatory agencies to determine the status or timing of activities, or procedures of the agencies; the preparation of general or specific background information, studies or analysis, for use by EEI or its member companies to determine the scope and potential impact of proposed, or potential federal regulatory or administrative action; the cost of researching and responding to **ALL** inquiries regarding the potential impact, proper implementation, or effect of, proposed or potential federal regulatory or administrative actions; and the cost of monitoring existing federal government programs.
- (2) **State** - All direct and indirect costs which are incurred for the purpose of an EEI or member company response to a State notice of inquiry or proposed State rulemaking or administrative, or regulatory proceeding, including the filing of comments on proposed regulatory, or administrative actions.

ADVERTISING (A1) - All costs, including costs of development (both direct and indirect), of paid and public service advertising in newspapers, magazines, radio, television and billboards and similar displays.

Advertising costs include the following categories:

- (1) **Conservation** -Identifies conservation techniques, benefits; demonstrates conservation methods including peak clipping, valley filling or load shifting;
- (2) **Safety** - Promotes safety, e.g., *informing customers of hazards*;
- (3) **Customer education** - Informs about ways to reduce costs; promotes use of efficient appliances; promotes efficient use of utility service; optional payment plans; financial assistance, etc.
- (4) **Legally required** - Is required by law or other governmental requirement;
- (5) **Promotes consumption** - Promotes continued or increased sales; i.e., *maintaining or increasing sales to present or prospective customers*;
- (6) **Institutional** - Enhances the image of EEI or of the utility industry as a business entity;

MARKETING AND DEMAND SIDE MANAGEMENT (M1) - The cost of all efforts (with the exception of advertising) to influence the demand for or sales of electricity. This account shall include the cost of research, publications, conferences, training sessions, meetings with trade allies, committee meetings or other efforts undertaken for the purpose of influencing the demand for or sales of electricity. Demand Side Management and marketing costs include the following:

- (1) **Strategic Conservation** - expenses related to exploration, development, analysis and implementation of means by which load shape might be modified by a reduction in sales as well as a change in the pattern of use;
- (2) **Peak Clipping** - expenses related to explorations, development, analysis and implementation of means by which load shape might be modified by the reduction of peak load;
- (3) **Valley Filling** - expenses related to exploration, development, analysis and implementation of means by which load shape might be modified by increasing off-peak loads.
- (4) **Load Shifting** - expenses related to exploration, development, analysis and implementation of means by which load shape might be modified by shifting loads from on-peak to off-peak periods;
- (5) **Strategic Load Growth** - expenses related to exploration, development, analysis and implementation of means by which load shape might be modified by a general increase in sales;
- (6) **Flexible Load Shape** - expenses related to exploration, development, analysis and implementation of means by which load shape might be modified temporarily.

UTILITY OPERATIONS AND ENGINEERING (UE) - The cost of collecting and providing information on utility operations and engineering issues to member companies, other utilities, and other utility organizations. For purposed of this definition, operations and engineering shall include engineering and standards, fossil and synfuels, nuclear power, and environment. This category shall not include costs for activities related to legislative advocacy or research, regulatory advocacy or research, surveys and analysis of State laws and regulation, public relations, or litigation.

FINANCE, LEGAL, PLANNING, AND CUSTOMER SERVICE (FL) - The cost of collecting and providing information on finance, legal and planning issues to member companies, other utilities and other utility organizations.

For purposes of this definition, finance, legal and planning shall include accounting, finance and regulation, legal, strategic planning, human resource management, information and administration, and information systems and library services. Customer Service and Support Information include expenses relating to the acquisition, compilation, categorization and dissemination of information useful in the improvement of the quality and value of service rendered to customers.

This category shall not include costs for activities related to legislative advocacy, legislative policy research, regulatory advocacy, regulatory policy research, surveys and analysis of State laws and regulation, sales promotion, public relations or litigation.

PUBLIC RELATIONS (PR) - The cost of developing and promoting reciprocal understanding and goodwill between EEI or its member companies and the various publics with which they interact including but not limited to the cost of developing and advancing an EEI or member company relationship or position with the media and the costs associated with responding to media inquiries. Public Relations shall include the costs associated with public opinion research which seeks to enhance the image of EEI, its member companies, or of the utility industry as a business entity or otherwise seeks to influence public opinion on matters not relating to legislative or regulatory issues.

The cost of public relations shall also include the costs associated with EEI employee time charges for time donated to outside organizations other than EEI member companies and any other expenses whose ultimate purpose is to develop goodwill or enhance the image of EEI, its member companies, or of the utility industry as a business entity, which do not more properly relate to other categories.

GENERAL AND ADMINISTRATIVE (GA) - Administrative expenses (subscriptions, membership fees to professional organizations, travel, etc.) for all divisions, except the Administrative and Treasury Division (A&T), and the Human Resource Department (HR) were allocated to the various NARUC categories in proportion to direct salary dollars within the respective divisions. Administrative expenses in the A&T Division were allocated in proportion to direct salary dollars.

OVERHEAD (OO) - Corporate-wide expenses allocated to the various NARUC categories in proportion to total company direct salary dollars. Overhead consists primarily of General Office (rent, depreciation, communications, maintenance, office supplies, postage, insurance, etc.) expenses.

Kentucky Power Company

REQUEST

Refer to the response to the Staff's First Request, Item 30(b), page 6 of 23. For each of the advertising transactions listed below, provide a copy of the advertisement or a copy of the text covered by the transaction.

- a. Voucher No. 00103692 – Kentucky Press Service, Inc.
- b. Voucher No. 00697601 – Marketing Services by Vectra.
- c. Voucher No. 00628390 – Marketing Services by Vectra.
- d. Voucher No. 00645405 – National Yellow Pages Media LLC.
- e. Voucher No. 00102258 – WYMT-TV.
- f. Journal ID INTCOM5794.

RESPONSE

- a. - d. Please refer to pages 2 through 15 of this response.
- e. A transcript of the television ad is as follows: Customer service means always being there. That's why Kentucky Power offers a wide range of options to customers 24 hours a day 7 days a week. Our website, kentuckypower.com, allows you to view your account and do business whenever you'd like. Whether you are reporting a service outage or a fallen line, requesting account information, reviewing convenient bill-paying options or looking for quick energy-saving tips, we can help. And if you need to talk to a representative, the experts at our customer solutions center are ready to take your call. Kentucky Power is there always working for you.
- f. Journal ID INTCOM5794 is moving advertising expenses paid by the Distribution or Transmission functions to the Generation function.

WITNESS – Ranie K. Wohnhas

<h1 style="margin: 0;">KPS</h1>	<h2 style="margin: 0;">KENTUCKY PRESS SERVICE</h2> <p style="margin: 0;">101 CONSUMER LANE FRANKFORT, KY 40601- Voice (502) 223-8821 Fax (502) 875-2624</p>
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Tuesday, November 30, 2004 09:07 AM

Invoice

Agency	JUDY TACKETT KENTUCKY POWER COMPANY P.O. BOX 5190 REGULATORY SERVICES 101 ENTERPRISE DRIVE FRANKFORT, KY 40602	PO Number	04113KK0
Client	KY POWER COMPANY		

Newspaper	Caption	Run Date	Ad Size	Rate Name	Rate	Color	Disc.	Gross
ASHLAND DAILY INDEPENDENT								
	Notice to customers of KY Power Co.	10/31/2004	4 x 12	CLDIS	\$19.85	\$0.00	0.0000%	\$952.80
	Notice to customers of KY Power Co.	11/07/2004	4 x 12	CLDIS	\$19.85	\$0.00	0.0000%	\$952.80
	Notice to customers of KY Power Co.	11/14/2004	4 x 12	CLDIS	\$19.85	\$0.00	0.0000%	\$952.80
BOONEVILLE SENTINEL								
	Notice to customers of KY Power Co.	11/04/2004	3 x 12	CLDIS	\$6.00	\$0.00	0.0000%	\$216.00
	Notice to customers of KY Power Co.	11/18/2004	3 x 12	CLDIS	\$6.00	\$0.00	0.0000%	\$216.00
	Notice to customers of KY Power Co.	11/25/2004	3 x 12	CLDIS	\$6.00	\$0.00	0.0000%	\$216.00
GRAYSON JOURNAL-ENQUIRER								
	Notice to customers of KY Power Co.	11/03/2004	3 x 12	CLDIS	\$7.75	\$0.00	0.0000%	\$279.00
	Notice to customers of KY Power Co.	11/10/2004	3 x 12	CLDIS	\$7.75	\$0.00	0.0000%	\$279.00
	Notice to customers of KY Power Co.	11/17/2004	3 x 12	CLDIS	\$7.75	\$0.00	0.0000%	\$279.00
GREENUP NEWS								
	Notice to customers of KY Power Co.	11/04/2004	3 x 12	CLDIS	\$6.25	\$0.00	0.0000%	\$225.00
	Notice to customers of KY Power Co.	11/11/2004	3 x 12	CLDIS	\$6.25	\$0.00	0.0000%	\$225.00
	Notice to customers of KY Power Co.	11/18/2004	3 x 12	CLDIS	\$6.25	\$0.00	0.0000%	\$225.00
HAZARD HERALD								
	Notice to customers of KY Power Co.	11/03/2004	5 x 11.5	CLDIS	\$7.75	\$0.00	0.0000%	\$445.62

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Amount Due Subject to 1.5% Service Charge After 30 Days
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KENTUCKY PRESS SERVICE

101 CONSUMER LANE
 FRANKFORT, KY 40601-
 Voice (502) 223-8821 Fax (502) 875-2624

Tuesday, November 30, 2004 09:07 AM

Invoice

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 KENTUCKY POWER COMPANY
 P.O. BOX 5190
 REGULATORY SERVICES
 101 ENTERPRISE DRIVE
 FRANKFORT, KY 40602

PO Number
 Order 04113KK0

Client KY POWER COMPANY

Newspaper

Caption	Run Date	Ad Size	Rate Name	Rate	Color	Disc.	Gross
Notice to customers of KY Power Co.	11/10/2004	5 x 11.5	CLDIS	\$7.75	\$0.00	0.0000%	\$445.62
Notice to customers of KY Power Co.	11/17/2004	5 x 11.5	CLDIS	\$7.75	\$0.00	0.0000%	\$445.62
HINDMAN TROUBLESOME CREEK TIMES							
Notice to customers of KY Power Co.	11/03/2004	3 x 12	CLDIS	\$6.70	\$0.00	0.0000%	\$241.20
Notice to customers of KY Power Co.	11/10/2004	3 x 12	CLDIS	\$6.70	\$0.00	0.0000%	\$241.20
Notice to customers of KY Power Co.	11/17/2004	3 x 12	CLDIS	\$6.70	\$0.00	0.0000%	\$241.20
HYDEN LESLIE CO. NEWS							
Notice to customers of KY Power Co.	11/04/2004	3 x 12	CLDIS	\$5.00	\$0.00	0.0000%	\$180.00
Notice to customers of KY Power Co.	11/11/2004	3 x 12	CLDIS	\$5.00	\$0.00	0.0000%	\$180.00
Notice to customers of KY Power Co.	11/18/2004	3 x 12	CLDIS	\$5.00	\$0.00	0.0000%	\$180.00
INEZ MOUNTAIN CITIZEN							
Notice to customers of KY Power Co.	11/03/2004	3 x 12	CLDIS	\$6.17	\$0.00	0.0000%	\$222.12
Notice to customers of KY Power Co.	11/10/2004	3 x 12	CLDIS	\$6.17	\$0.00	0.0000%	\$222.12
Notice to customers of KY Power Co.	11/17/2004	3 x 12	CLDIS	\$6.17	\$0.00	0.0000%	\$222.12
JACKSON TIMES							
Notice to customers of KY Power Co.	11/03/2004	3 x 12.75	CLDIS	\$6.11	\$0.00	0.0000%	\$233.71
Notice to customers of KY Power Co.	11/10/2004	3 x 12.75	CLDIS	\$6.11	\$0.00	0.0000%	\$233.71
Notice to customers of KY Power Co.	11/17/2004	3 x 12.75	CLDIS	\$6.11	\$0.00	0.0000%	\$233.71

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 FRANKFORT, KY 40602

PO Number
Order 04113KK0

Client KY POWER COMPANY

Newspaper

Caption	Run Date	Ad Size	Rate Name	Rate	Color	Disc.	Gross
KY Power Co.							
LOUISA BIG SANDY NEWS							
Notice to customers of KY Power Co.	11/03/2004	6 x 11.5	CLDIS	\$7.00	\$0.00	0.0000%	\$483.00
Notice to customers of KY Power Co.	11/10/2004	6 x 11.5	CLDIS	\$7.00	\$0.00	0.0000%	\$483.00
Notice to customers of KY Power Co.	11/17/2004	6 x 11.5	CLDIS	\$7.00	\$0.00	0.0000%	\$483.00
MANCHESTER ENTERPRISE							
Notice to customers of KY Power Co.	11/04/2004	4 x 11.5	CLDIS	\$7.25	\$0.00	0.0000%	\$333.50
Notice to customers of KY Power Co.	11/18/2004	4 x 11.5	CLDIS	\$7.25	\$0.00	0.0000%	\$333.50
Notice to customers of KY Power Co.	11/25/2004	4 x 11.5	CLDIS	\$7.25	\$0.00	0.0000%	\$333.50
MOREHEAD NEWS							
Notice to customers of KY Power Co.	11/02/2004	3 x 12	CLDIS	\$7.75	\$0.00	0.0000%	\$279.00
Notice to customers of KY Power Co.	11/09/2004	3 x 12	CLDIS	\$7.75	\$0.00	0.0000%	\$279.00
Notice to customers of KY Power Co.	11/16/2004	3 x 12	CLDIS	\$7.75	\$0.00	0.0000%	\$279.00
PAINTSVILLE HERALD							
Notice to customers of KY Power Co.	11/03/2004	4 x 12.75	CLDIS	\$7.00	\$0.00	0.0000%	\$357.00
Notice to customers of KY Power Co.	11/10/2004	4 x 12.75	CLDIS	\$7.00	\$0.00	0.0000%	\$357.00
Notice to customers of KY Power Co.	11/17/2004	4 x 12.75	CLDIS	\$7.00	\$0.00	0.0000%	\$357.00

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 101 ENTERPRISE DRIVE
 FRANKFORT, KY 40602

PO Number
 Order 04113KK0

Client KY POWER COMPANY

Newspaper

Caption	Run Date	Ad Size	Rate Name	Rate	Color	Disc.	Gross
PIKEVILLE APPALACHIAN NEWS-EXPRESS							
Notice to customers of KY Power Co.	11/03/2004	5 x 12.5	CLDIS	\$10.20	\$0.00	0.0000%	\$637.50
Notice to customers of KY Power Co.	11/07/2004	5 x 12.5	CLDIS	\$10.20	\$0.00	0.0000%	\$637.50
Notice to customers of KY Power Co.	11/14/2004	5 x 12.5	CLDIS	\$10.20	\$0.00	0.0000%	\$637.50
PRESTONSBURG FLOYD COUNTY TIMES							
Notice to customers of KY Power Co.	10/31/2004	5 x 12.5	CLDIS	\$7.65	\$0.00	0.0000%	\$478.12
Notice to customers of KY Power Co.	11/07/2004	5 x 12.5	CLDIS	\$7.65	\$0.00	0.0000%	\$478.12
Notice to customers of KY Power Co.	11/10/2004	5 x 12.5	CLDIS	\$6.76	\$0.00	0.0000%	\$422.50
SALYERSVILLE INDEPENDENT							
Notice to customers of KY Power Co.	11/04/2004	3 x 12.75	CLDIS	\$4.50	\$0.00	0.0000%	\$172.12
Notice to customers of KY Power Co.	11/11/2004	3 x 12.75	CLDIS	\$4.50	\$0.00	0.0000%	\$172.12
Notice to customers of KY Power Co.	11/18/2004	3 x 12.75	CLDIS	\$4.50	\$0.00	0.0000%	\$172.12
SANDY HOOK ELLIOTT COUNTY NEWS							
Notice to customers of KY Power Co.	11/05/2004	3 x 12.75	CLDIS	\$3.73	\$0.00	0.0000%	\$142.67
Notice to customers of KY Power Co.	11/12/2004	3 x 12.75	CLDIS	\$3.73	\$0.00	0.0000%	\$142.67
Notice to customers of KY Power Co.	11/19/2004	3 x 12.75	CLDIS	\$3.73	\$0.00	0.0000%	\$142.67
VANCEBURG LEWIS COUNTY HERALD							
Notice to customers of KY Power Co.	11/02/2004	3 x 12.75	CLDIS	\$3.75	\$0.00	0.0000%	\$143.44

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